



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 Broadway
New York, NY 10007-1866

July 21, 2016

Certified Mail

Return Receipt Requested

Ms. Mary Lou Capichioni
The Sherwin-Williams Company
101 Prospect Avenue NW
Cleveland, OH 44115-1075

RE: Review of the March 31, 2016 "Soil Site Characterization Summary Report" Former Manufacturing Plant Area – Sherwin-Williams/Hilliards Creek Superfund Site, Gibbsboro, New Jersey.

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has reviewed the "Soil Site Characterization Summary Report" (Soil SCSR) for the Sherwin-Williams/Hilliards Creek Superfund Site, Former Manufacturing Plant (FMP) area, dated March 31, 2016.

The Soil SCSR currently includes a summary of the findings, as well as the data, for soils associated with a stretch of Hilliards Creek. EPA is directing Sherwin-Williams to remove future evaluation of Hilliards Creek (transect data) from the draft Remedial Investigation for the FMP area soil Operable Unit (OU). Hilliards Creek will be included as a future OU, which will include Silver Lake, entire Hilliards Creek and Kirkwood Lake. The EPA's comments on the FMP soil SCSR are enclosed (Enclosures).

In accordance with the Administrative Order on Consent, Section VII, paragraph 27.g (Task VII) the draft Remedial Investigation Report is due to EPA thirty days from receipt of this letter.

If you have any questions, please contact me at 212-637-3916 or at Klimcsak.Raymond@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Klimcsak".

Ray Klimcsak, Remedial Project Manager
New Jersey Remediation Branch

Enclosures

Attachment 1

Comments on the Soil SCSR for FMP soils

1. Page ES-1 – First bullet on page. Defines 1 of the 6 subareas as “6 East Clementon Road and the surrounding area”, however, please indicate that only the slab of the 6 East Clementon Road structure currently exists.
2. Page ES-1 – Second bullet. Prior reference to the 6 subareas was “areas”, however, they are now referred to as “subareas”. Please revise to maintain consistency, using the term “subareas”. Additionally, some context needs to be established to indicate why the term “Main Plant area” is being used, when it doesn’t include any structures. As an alternative, it may be suitable to term “Former Main Plant Area”.
3. Page ES-2 – First bullet on page. Requires revision to indicate that portions of the 2 and 4 Foster Avenue structures are included in this subarea. Additionally, included in this subarea is a portion north of the former resin plant, which extends north, nearly to the former 55 United States Avenue structure. The rationale for this extent (that it extends beyond the former Resin Plant area) should be clarified. If the intent is to include a discussion of data that may have been collected from this area, this data should be included as well.
4. Page ES-3 – first full paragraph. It is stated that, “Many of the investigations included groundwater characterization activities as well as soil sampling. The historic groundwater activities are not discussed in this SCSR but will be included in a subsequent groundwater SCSR. This SCSR does, however, present the lines of evidence used to determine the extent to which residual petroleum product is present in soil at the FMP.” Further clarification is required to identify “which groundwater activities”, outside of historic groundwater sampling activities will be used in this SCSR and what are the “lines of evidence” (i.e., not just validated laboratory-grade data).
5. Executive Summary, Geophysical Investigation, Page ES-3, 1st sentence: The document should correctly reference the Department’s Residential Direct Contact Soil Remediation Standards.
6. Page ES-3 – Geophysical Investigation – EPA is requesting that the statement that no evidence of any on-going source(s) of contamination or any conduit(s) through which contaminants is being transported to be removed. Several of the trenching activities (12/17/2012) and (5/10/2010) revealed piping, of which the beginning and terminus of them were not delineated. In addition, at each of these locations, PID readings, stained soils, odors and in the case of the excavation area on 5/10/2010, elevated XRF readings (lead was above 8,000 ppm in source material), were observed. During the 12/17/2012

trenching activities, thirteen (13) pipes were observed (Attachment 2 – Field Notes from 12/17/2012).

7. Page ES-5 – Top of page, EPA is directing Sherwin-Williams to remove the statement, “the EPA criterion for high occupancy without a cap” from the draft RI when it is submitted. Note, it is acknowledged that this statement was made about the Hilliards Creek floodplain and that EPA is directing that Hilliards Creek be removed from the draft RI when it is submitted.
8. The executive summary provides a brief description of, among other activities, some of the key findings. Several of the key contaminants, residual petroleum product and polychlorinated biphenyls (PCBs) are indicated. There is no discussion of lead and arsenic, which are the most frequent contaminants found (particularly in soil) at the other sites. A brief discussion of these metals should be included in the executive summary.
9. In general the executive summary makes several references to the Silver Lake bypass (conveyance system). Additional information should be provided about this bypass. For instance its depth, its size, length, etc. There was also data collected from material within the conveyance system. EPA is requesting that these facts be provided, even if it will result in the actual data being included in a future OU for the overall “waterbodies”.

In addition, there were three other activities within the FMP area that resulted in areas being excavated: the area near the former “Scarborough bulkhead” behind the Gibbsboro Police Station; the Brandywine “Sinkhole Repair” (near the 6 East Clementon slab); and the “former Pump House” removal action along Hilliards Creek. While there is currently some discussion of the removal actions associated with the former “Scarborough bulkhead” and the “former Pump House”, there is no discussion of the sinkhole repairs. The estimated locations of these three areas, size of excavations, and any data (including post-excavation samples) needs to be provided in the draft RI, along with an associated figure depicting the locations and size of excavations.

Finally, Page 1-25 it is stated that 230 tons of soil was removed during activities that were conducted for the EPA Removal program. This area should be included in the figure that EPA is requesting (above paragraph), as well as any data available that may have been collected during the activities.

10. Page 1-1 (Section 1.1) – First paragraph, second to last sentence. As written, the statement suggests that Sherwin-Williams was working under the oversight of EPA as early as 1976. This is inaccurate, please revise the statement. In addition, a description of any Orders, that Sherwin-Williams performed prior work with EPA Removal Action Branch and (separately) NJDEP, need to be cited, along with the applicable dates.
11. Figure 2 – Is missing the designation for 5 Foster Avenue.

12. Page 1-2 – EPA is requesting that any time there is a structure (ie., 2 Foster, etc.) within a subarea, that it be referenced. For example, for the write up for the subarea 6 East Clementon Road, it should be identified that this area includes the slab (of the former 6 East Clementon Road structure) and it also includes the 10 Foster Ave structure.
13. Page 1-2 (fifth bullet) – EPA is requesting that the date of the lagoon closure be changed to 1979, as “fluids” are still noted in the aerial photograph (Appendix A – 1979).
14. Page 1-3 (and Figure 2) – Features, such as Tank Farm A and Tank Farm B are referenced, but not noted in Figure 2. EPA is requesting that a historic features figure be overlayed onto Figure 2. This would also aid the reviewer in understanding features noted in Section 1.2.1 (Page 1-2) as well as in the Executive Summary.
15. Page 1-3 (Section 1.2.2) – Second paragraph, first sentence, EPA is requesting that in addition to paint, varnish and lacquer be referenced as items historically produced at the FMP area.
16. Page 1-5 (Section 1.2.2) – First paragraph on page, after the sentence that ends with (Figure 2). EPA is directing Sherwin-Williams to add the following: “Wastewater was discharged by gravity from the former facility to a lift station and subsequently pumped to a 27,000 gallon concrete holding basin. Alum was added to the wastewater, and then the wastewater was gravity fed from the basin of Lagoon 1 for coagulation and settling. The wastewater was then transferred to Lagoons 2, 3, and 4 for biological treatment.”
17. Page 1-7 (Section 1.2.4.1) – EPA is requesting that it be clarified, under what authoritative instrument (i.e., Order or Directive) that Sherwin-Williams, in 1976 performed work under the direction of the NJDEP. (As an observation, it is stated that Scarborough performed work under NJDEP oversight and that it was performed in response to a NJDEP directive to contain petroleum seeps).

Last paragraph on Page 1-7, first sentence, EPA is requesting that the word “remedial” be inserted prior to the word investigation. In addition, EPA is requesting that the last sentence be removed and replaced with: “Sherwin-Williams performed these RI activities under an Administrative Consent Order (ACO) with NJDEP dated 20 September 1990.”

18. Page 1-8 (Section 1.2.4.1) – First paragraph, after the first sentence, EPA is requesting that the following statements be inserted, “In April 2002, a new release of free-phase product was observed in the Seep Area and reported. On 29 April 2002, EPA issued Sherwin-Williams a Notice to Responsible Party, Under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA) to Respondent (“Expedia Notice”). The Expedia Notice required Sherwin-Williams to perform the following: interim actions to prevent discharge from the Seep Area from reaching Hilliards Creek and additional

geophysical and soil investigations throughout the FMP area.” After inserting these statements, delete the last sentence of the paragraph.

19. The location (specific appendix of the Weston, 2007a “report”) of where to find data from the “Pre-1991 Investigations” is provided in the SCSR, however, the applicable appendix within the Weston report for data collected under “Remedial Investigation Activities Conducted Under NJDEP Oversight” is not provided in the SCSR. Please revise.
20. Page 1-12 (Section 1.2.4.1) – Last sentence for write-up regarding “July 1995 through August 1995 – Phase III RI”. After the statement, “The two USTs were subsequently removed by the property owner in 2007”, EPA is directing Sherwin-Williams to include the following attachment (Attachment 3 – NJDEP “No Further Action” letter) as an appendix.
21. Page 1-13 (Section 1.2.4.1) – First paragraph on page (pertaining to the write-up for “July 1998 through January 2000 – Phase V RI”). First sentence provides a reference to a former pump house. EPA is seeking additional clarification, is this the same pump house that is discussed later on the same page, under the summary for EPA Removal Branch?
22. Page 1-14 (Section 1.2.4.1) – First paragraph for write up regarding “Geophysical Investigation”. EPA is requesting that the firm’s name that performed the geophysical investigation and interpretation be provided in this first paragraph. In addition, this subsection provides a summary of the instrumentation used to perform the geophysical investigation, but the results are not provided. EPA is requesting that the results be included as an Appendix.
23. Pages 1-16 through 1-18 (Section 1.2.4.1) – In the write-up for “Subsurface Characterization and Investigation” there is no reference for where the reviewer can find the results of these activities. In addition, although a summary of the activities is provided, the results are not (i.e., what is the lateral extent of free-product that was determined as a result of conducting these activities).
24. Page 1-18 (Section 1.2.4.1) – Similar to Comment #23 above, the location for where the reviewer can find the results for “Confirmatory Soil Sampling” is not provided. Third paragraph of this sub-section, last sentence, it is not clear what is meant by the statement “as applicable”. Clarify if it means that soil samples underwent analysis for items (at a frequency) less than those listed.
25. Page 1-19 (Section 1.3) – Bullet #2, clarify if the “Paint Works RIR” is the same referenced document provided earlier as “Weston 2007a”.
26. Page 1-20 (Section 1.3.1.2) – Within the discussion on “Interim measures to control the seep”, it is stated that the bulkhead structure was removed in September 1996. Clarify

by whom and why, as it was previously stated that the bulkhead succeeded in stopping the product from entering the surface waters. In addition, “what” and “where” is the parking lot structure that is still in place?

27. Page 1-20 (Section 1.3.1.3) – State to “whom” did NJDEP issue a Directive to.
28. Page 1-21 (Section 1.3.1.3) – Fourth bullet on page, clarify that the term “off-site recycling” (of contaminated soils) is correct.
29. Page 1-21 (Section 1.3.1.3) – Clarify for the reviewer that the “two” work plans (numbered on page 1-21) were both approved by NJDEP and this resulted in the November 1995 – Focused Feasibility Study (FS) Remedial Action Work Plan (RAW) and therefore the RAW included both: a) Immediate Environmental Concerns and b) Free-floating Product Areas at the Paint Works Corporate Center.
30. Page 1-22 (Section 1.3.1.3) – Within the write-up for “5 Foster Avenue Area”, define what the wooden containment structure was that was removed. Is it the same as the 8 x 40 (foot) bulkhead that was described on Page 1-20? Also, in the first bullet within this write-up it is stated that soil samples were collected. Are they part of any of the RI Phases (I – V) described earlier? Please clarify.
31. Page 1-22 (Section 1.3.1.3) – In addition to referring the reviewer to the 2007 Seep Area Report (for additional details), any and all dated documents, previously submitted to NJDEP which documents activities, need to be referenced here. This not only applies to the Seep Area and soil vapor extraction (SVE) activities, but any other activities which were documented prior to the 2007 Comprehensive RI Report and Seep Area Report.
32. Page 1-22 (Section 1.3.1.3) – Last paragraph on page, revise statement to provide the date of the NJDEP Order (ACO) and indicate that it was terminated, not cancelled. In addition, EPA is requesting copies of the progress reports that are referenced in this paragraph. Also, please confirm that the SVE system was in operation up until 2010. Finally, please describe to the reviewer what the monthly manual product recovery activities are.
33. Page 1-23 (Section 1.3.1.4) – Last sentence of first paragraph, remove last sentence and replace with, “EPA did not finalize the AOC, but Sherwin-Williams did perform elements in the draft SOW.”
34. Page 1-26 (Section 1.3.1.4) – The document states, “Upon removal of the structure (pump house) paint pigment was observed and the excavation was expanded, at which point there was no further visual contamination observed in the sidewalls.” The document should clarify if post-ex confirmatory soil samples were collected or if “visual observation” was the only method used in determining the excavation endpoint.

35. Section 1.3.1.4 Sherwin-William Activities under EPA Removal Action Branch Oversight, Page 1-25, 1st paragraph: The document states, “An active skimmer pump was installed in the inlet C interceptor trench only to collect free-phase product that was intercepted by the trench.” The document should clarify if this skimmer pump is still in place and functioning as intended.
36. Page 1-27 (Section 1.3.1.4) – EPA is requesting that Sherwin-Williams provide a copy of the October 2003 “Incident Report” if it is not included in the 2007 Seep Area Report. In addition, text should be added to the write-up for “May 2003” to include estimates of the total volume of product and product/water mix were generated as a result of the response actions.
37. Page 2-1 (Section 2.0) – EPA is requesting that the 2015 soil sampling, outside the Hilliards Creek floodplain, in close proximity to 7 Foster Avenue, be included and discussed (as part of the Remedial Investigation activities) when the draft RI is submitted. Additionally, it was previously commented (Comment #3) that the area “north” of the former Resin Plant area is discussed, but it appears that no data is provided. If it is intended to include data (e.g., the 2015 ERT soil data) from this area, this should be provided and discussed as well.
38. Page 2-2 (Section 2.0) – Second paragraph on page, second sentence. EPA has reviewed the June 19, 2008 “Paint Works Strategic Sampling Work Plan” and the 2005 “Decision-Making Process”. The 2008 Work Plan contained a discussion on Identification of Screening Criteria and Selection of COPCs. There was a specific discussion on the NJDEP “soil clean-up standards” for arsenic. However, there was no discussion in the 2008 Work Plan, nor the 2005 “Decision-Making Process” on co-location with other constituents, nor/or classes of constituents. EPA is directing Sherwin-Williams to remove the references to “co-location with other constituents, or classes of constituents.”
39. Page 2-2 (Section 2.0) – EPA is requesting that a discussion of soil, in comparison to the NJDEP – Impact to Groundwater Criteria, be included in the draft RI.
40. Section 2.0 Remedial Investigation Summary, Pages 2-2 and 2-3: The document states, “With this change, NJDEP revised its residential standard for petroleum hydrocarbons from 10,000 mg/kg for TPH to 1,700 ppb for EPH where the discharge consisted solely of No. 2 fuel oil or diesel, and 5,100 mg/kg for discharges consisting of mixed constituents.” The document should be revised to accurately reflect the Department’s *Protocol for Addressing Extractable Petroleum Hydrocarbons (EPH) (Version 5.0, August 9, 2010)* which states for Category 1 (i.e. No. 2 fuel oil/diesel) the residential criteria for EPH is 5,100 mg/kg, and for Category 2 (i.e. petroleum mixtures) the residential EPH sample-specific health-based soil remediation criteria must be developed using the EPH Calculator.

The document also states, “Although the NJDEP standard of 5,100 mg/kg is usually applied to discharges other than diesel or No. 2 fuel oil...”. As noted above, this statement is also

incorrect as the EPH residential criteria of 5,100 mg/kg is applicable to Category 1 discharges of No. 2 fuel oil and diesel fuel.

The document also states, "The petroleum present in the subsurface at the FMP is a light mineral spirit containing low concentrations of target compounds. It is not a mixed discharge, so the 5,100 mg/kg value is considered more applicable..." The Department finds that while the petroleum product plume at the FMP is characterized as consisting solely of degraded mineral spirits; the tanks in Tank Farm A and throughout the FMP also contained numerous other products. As such, it is likely that the product plume and associated soil contamination also consist of a mixture of these products formerly held in Tank Farm A or used throughout the FMP. Therefore, in evaluation of the data, the Department finds that the analytical requirements for unknown Petroleum Hydrocarbons as outlined in the TRSR N.J.A.C. 7:26E-2.1 (d) and Table 2-1 Analytical Requirements for Petroleum Storage and Discharge Areas, are applicable to the FMP. In addition, the Department finds that the EPH data should be evaluated both as a Category 1 (No. 2 fuel oil/ diesel fuel) as proposed by SW and as a Category 2 (i.e. petroleum mixtures), such that whichever Category produces the strictest criteria should be used in evaluating the data.

However, please note the EPH Protocol (on Page 2) also states, "*Furthermore, the Department is establishing an ecological screening value of 1,700 mg/kg...that is applicable to all petroleum hydrocarbon discharges if and only if a sensitive environmental resource is potentially impacted by petroleum hydrocarbon contamination as determined by a baseline ecological evaluation (N.J.A.C. 7:26E-3.11).*" As such, the Department finds that with the historic and continuing discharges to Hilliard's Creek and the potential for ecological impacts, the ecological criteria of 1,700 mg/kg for EPH is also applicable.

41. Page 2-6 (Section 2.0) – Second full paragraph, to aid the reviewer, indicate the general location of where the former plant production wells were believed to exist. In addition, cite the location again (even though the specific sample locations are provided), on Page 2-7 (second full paragraph).
42. Page 2-5 (Section 2.3.1) – It is stated that 96 soil borings were installed during the FMP Strategic Sampling and that the "original" (please provide date of Work Plan) FMP Strategic Sampling Work Plan identified 82 borings, but that an additional 14 were installed to support a project by the current property owner. In addition, indicate whether the 14 sample locations underwent the same sampling and analytical procedures as did the 82 borings throughout the FMP area. Note, bottom of Page 2-7 states that there was no pre-determined analytical protocol for the samples collected as part of the investigation to support the property owner.

Separate from the sampling summarized here, in support of the property owner, EPA is requesting that Sherwin-Williams provide a summary of any sampling performed in support of the property owners efforts to perform irrigation work (along Foster Avenue and near 3 United States Avenue, as well as the efforts to repair sink holes, near 6 East Clementon and the Silver Lake conveyance system.

43. EPA is requesting that the December 2012 trenching activities be discussed in the draft RI. The trenching activities were the result of activities requested by EPA, and discussed by Sherwin-Williams in the January 31, 2012 report (Page 7), in which Sherwin-Williams agreed to advance two trenches. The results of the trenching activities are presented in the December 17, 2012 field notes.
44. EPA is requesting the Figure 44 from the March 2011 report for the Paint Works, be included in the draft RI when it is submitted.
45. Section 2.3.2.6, page 2-11 – Second to last sentence on page, remove the statement, “Less than a sandwich bag-sized amount of green material was found in the excavations.”
46. Section 2.3.2.9, page 2-13 – Third paragraph, again, EPA is directing Sherwin-Williams to remove any reference to “sandwich bag-sized” piece of red material.

In addition, EPA is requesting that Figure 14 be updated to include PID readings (above 300 ppm) that were detected during all of the trenching activities.

47. Section 2.5, page 2-17 – No summary of the findings of Sherwin-Williams’ sampling at 6 E. Clementon. Please update to include a brief summary of the findings in the draft RI.
48. Section 3-1, Page 3-1, last paragraph states “As shown on Figure 5...NJDEP-mapped wetlands or a Federal Emergency Management Administration (FEMA) mapped flood zone.” Please provide a definition or explanation of the types of wetlands found on the map.
49. Section 3.2, page 3-2 – Appendix A (Aerial photographs) dates figures (3/22 and 4/11, 1989; 3/8/1990; and 12/27/1994) all depict “piles” in the vicinity of the former lagoon area. As these piles are still features which exist in the area today, they need to be noted in the draft RI report.

In addition, image (dated 9/12/1970), top of page, a yellow call out line points to an anomaly to the south of 6 East Clementon Ave. Please clarify the nature of the anomaly.

50. Section 4.1, page 4-1 – EPA is requesting to keep Figure 8 with the geotechnical results, but to also include Figure 2 (from Report Date – January 2012) “Former Manufacturing Plant – Geophysical Anomaly Excavation Locations – Overlay On 1975 Aerial Photograph”, with the draft RI when submitted.
51. Section 4.1, page 4-1 – Figure 9 fails to include the Dec. 2012 trenching activities. See earlier comments.

52. Section 4.1, page 4-1 – Second paragraph, last sentence. Clarify, when it is stated, discolored material was collected and analyzed, whether the material was screened with the XRF, or was it sent to a laboratory for confirmatory analysis.
53. Section 4.1, page 4-1 – Third paragraph, EPA does not agree with Sherwin-Williams' conclusion that the targets are not contamination sources. Pipes investigated on 12/2012 show evidence otherwise. Additionally, T-11, when excavated, had product seeping into the hole.
54. Section 4.1, page 4-2 – Write up for Area B. EPA is requesting Sherwin-Williams to add, that in addition to Sherwin-Williams believing that T-11 was a foundation wall, it needs to be stated that product seeped into the excavation hole and that the excavation was not advanced further.

In addition, the write up for Area B also includes reference to former Building 50. Since this is currently the Gibbsboro Police Station (at 5 Foster Ave.), reference should be made to this and not a former building number.

55. Section 4.2, page 4-6 – Do not agree with Sherwin-Williams' conclusion that there are no conduits through which contamination is being transported. The excavation activities that occurred on 12/2012 were unable to trace the full extent of the 13 pipes present.
56. Section 4.3, page 4-7 – In addition to the list of items that Sherwin-Williams has identified as being potential lines of evidence that Sherwin-Williams provides, EPA is requesting that the EPA sub-slab VI data results be included.
57. Section 4.3 Residual Product Delineation, beginning on Page 4-7: The document references that several lines of evidence were evaluated to determine the vertical and horizontal extent of the residual petroleum product at the FMP. However, a review of the Figures indicates that only total petroleum hydrocarbons (TPH) and EPH analytical data were used to determine the extent of the product plume. The document should include an evaluation of individual volatile organic compounds (VOC) and semi-volatile organic compounds (SVOC) and Total VOC tentatively identified compounds (TICs) and Total SVOC TICs as "additional lines of evidence". As part of this evaluation, the document should also include Figures representing Total VOC TICs and SVOCs TICs in soil for the entire site.
58. Section 4-3, Page 4-8, third paragraph states "West of this general area, on the western portion of the Main Plant Area and on the 6 East Clementon Road subarea, are six locations where PID results greater than 500 units were observed, or there was a soil boring with an EPH or TPH concentration greater than 5,100 mg/kg." Please identify/name these six locations in the report.
59. Section 4.3 Residual Product Delineation, Page 4-8, 3rd bullet: The document states that the inferred horizontal extent of petroleum product as represented on Figure 14 is based on

several lines of evidence including “PID readings at any depth exceeding 300 units”. The document should clarify the significance of “300 units” in confirming the presence of product.

60. Section 4.3, page 4-9 – EPA is requesting that statement: “...because the residual petroleum product is the only volatile constituent found in the soil at the FMP”, be removed. EPA does concur that elevated PID readings are a good indicator of the presence of VOC and SVOC contamination at the site and that it provides insight into the “lines of evidence” which provides an indication of the extent of contamination present.
61. Section 4.3 Residual Product Delineation, Page 4-9 and Figure 15: The document states that cross-section in Figure 15 integrates PID reading and EPH and TPH values and supports two conclusions such that “there is no quantitative correlation between EPH/TPH and PID readings” and that “the residual petroleum product is not uniformly distributed either horizontally or vertically”. The document should clarify how the data presented in Figure 15 supports these conclusions. In addition, the document should clarify why the borings used in this evaluation were located adjacent to the residential properties and not within the Seep Area where product is known to exist.
62. Section 4.4, page 4-10 – First full paragraph on page, second to last sentence. Change “Seep Areas” to “Area”.
63. Section 4.4.1, Page 4-13, third full paragraph states “Where found at concentrations greater than the RDCSRS, the majority of PCB concentrations are between the RDCSRS (0.2 mg/kg) and 1 mg/kg, the EPA cleanup criterion for high occupancy exposure without a cap.” Although accurate, the statement doesn’t provide a complete picture of PCBs at this section of Hilliards Creek, particularly the two most downgradient transects of the creek. In cases where PCBs were detected in the most downgradient transect location, each of the six sample locations reported PCBs greater than 1 mg/kg. In cases where PCBs were detected in the next closest up stream location, seven of twelve locations have reported PCB concentrations above 1 mg/kg. Please include this information for clarity.
64. Section 4.4.2, page 4-15 – EPA is requesting that the following statement be removed: “If a remedy other than containment and institutional controls is determined to be applicable to this area, additional data can be collected as part of a pre-design investigation.” As it is more applicable to the Feasibility Study.
65. Section 4.4.3, Page 4-17, first paragraphs states “However the data collected on these surrounding subareas do provide delineation of the FMP.” This subarea should be “Main Plant Area” and not FMP. Please revise.
66. Section 4.4.5 Seep Area and Adjacent Residential Area, Page 4-19, 2nd paragraph: The document questioned the validity of lead results for soil samples collected at monitoring

well MW-14 near the Seep Area. However, a review of the figures indicates that MW-14 is located within close proximity to Hilliards Creek where lead has been detected at elevated levels in the soil and sediment. As such, the statement questioning the validity of lead concentrations in the soil at MW-14 should be removed from the document.

67. Table 2 Sample Summary Table: The Department finds that since the document is broken into subareas for ease of evaluation, Table 2 should be revised to reference these same subareas for ease of review.
68. Figure 15: EPA is requesting that a line be added to show the depth to water encountered at each boring.
69. Figure 22 includes the depiction of sample locations which have been defined as "Soil Boring Location With Non-Detect Result Greater Than Respective NJDEP RDCSRS Criterion". EPA is requesting that the application of this depiction be applied to all subareas (i.e., Seep Area, Main Plant Area, etc.).

In addition, EPA is acknowledging that concerns with elevated method detection limits (MDLs) have been raised previously, as documented in a January 21, 2012 and February 14, 2013 correspondence from Sherwin-Williams. It was further discussed on an October 30, 2013 conference call between EPA, NJDEP, Weston and Test America (laboratory). On the call EPA outlined several laboratory procedures which could potentially enable the laboratory to better analyze VOC samples, to alleviate the concerns with elevated MDLs associated with VOC analysis to date. To date, EPA has not revisited this concern, however, EPA is reserving its right to revisit this topic in the future, possibly during any future remedial design sampling.

70. Tables 3 and 4 require footnotes that define the tables such as abbreviations, bolding and shading. Please add the appropriate footnotes.

Page:

1

Date:

12/17/12

Logger:

Aaron Moz

WEATHER: 30s & possible rain showers

Am

H&S MEETING: Working around heavy equipment - A

Am

TEAM MEMBERS: Aaron Moz & Rob Craskey (Weston)
Mike Pantano (HDR), Joe Fulse & Mark
McKinney (EWM) Am

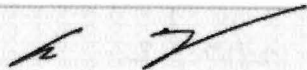
7:30 Weston arrives at the field office. Today we will be digging test pits at the Former Manufacturing Plant. The work is being performed in accordance with the January 2012 Revised Work Plan for Additional Site Characterization. - A

7:15 Calibrate the PID with 100 ppm isobutylene as it reads = 100 ppm. We also have an XRF unit. Am

7:30 loading site vehicle. Am

8:10 Waiting for EWM to arrive on site. Weston to Former Tank Farm A to see today's excavations. Take pictures of today's locations. Pictures on next pages A

Signature:



12/17/12



Page:

2

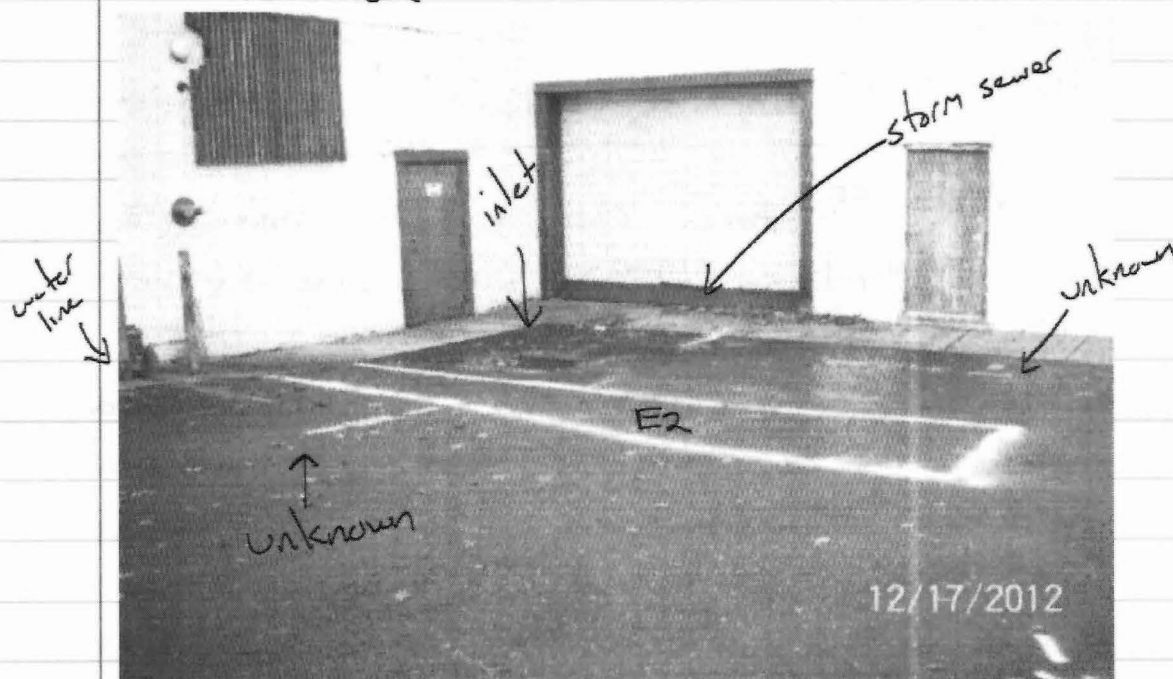
Date:

12/17/12

Logger:

Aaron Mroz

E2 location



[Handwritten signature]

Signature:

[Handwritten signature]

12/17/12

WESTON
SOLUTIONS

Page:

3

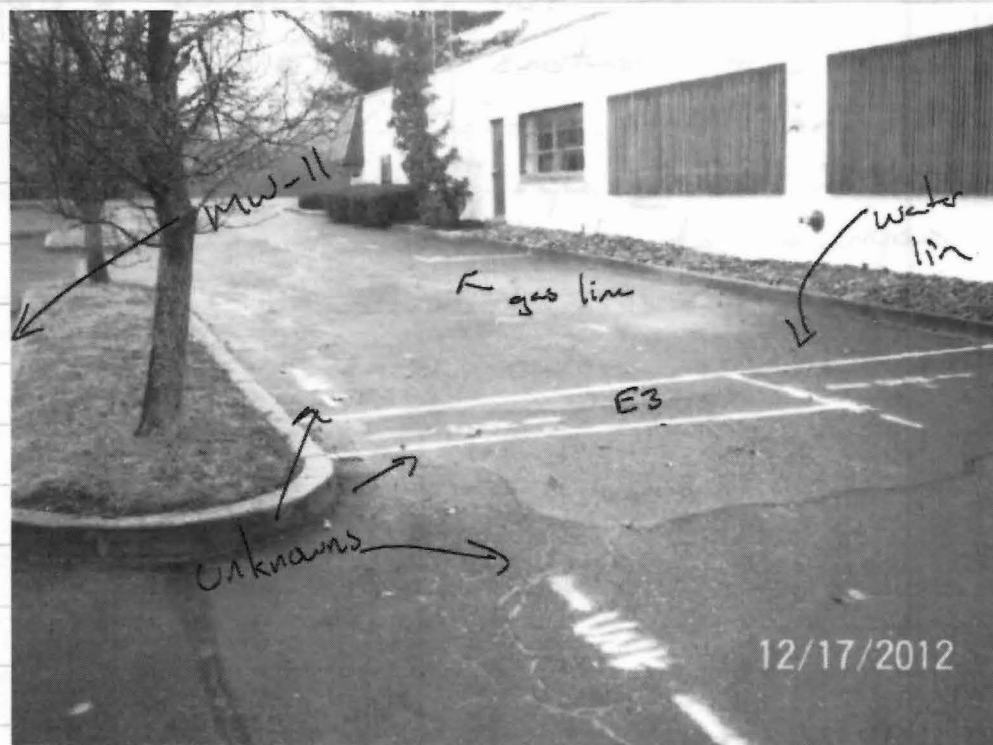
Date:

12/17/12

Logger:

Aaron Mroz

E3 location



- 8:25 Pat Austin calls Ewmi and they state they are on their way. — A
- 8:30 Back to field office to wait for Ewmi-A
- 8:50 Ewmi is at the site. Mobilize to meet them. — A
- 8:55 Meet Ewmi at 1 Foster Ave and move to Tank Farm A. Ewmi has a Truck with a backhoe and a pickup truck.
- Signature: *[Signature]* 12/17/12 **WESTON SOLUTIONS**

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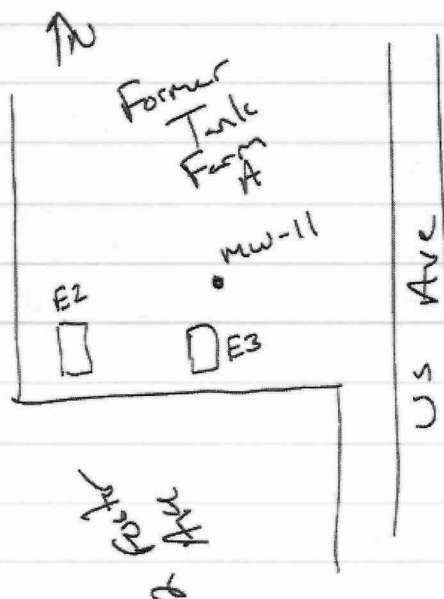
Date:

12/17/12

Logger:

Aaron Moz

- with a trailer full of equipment & supplies.
- 9:00 Walk out locations in Former Tank Farm A and have a H&S meeting. — m
- 9:15 Ewme setting up. They will cut the asphalt at both locations before they start excavation activities. — m
- 9:20 Excavation locations (WTS)



- 9:30 Ewme cutting the asphalt at E2. — m
- 9:40 Lynn Vogel (WDEP) onsite. — m
- 9:45 Ray K (EPA) onsite. — m
- 10:00 Complete cutting at E2. Setting up

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12/17/12

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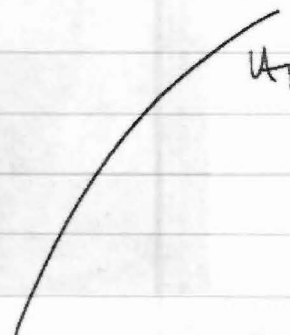
Date:

12/12/12

Logger:

Aaron Moore

10:05 Start removing the asphalt with the backhoe.



10:08 Load of DGA onsite and dumped in a parking spot by 3 US Ave. — A

10:25 Asphalt removed. — A

10:28 The asphalt is approximately 3 inches thick and the base course is 2 inches thick. A

10:30 Start digging. — A

10:35 PID readings 0-0.5 ft = 6.6 ppm, 0.5-1.0 ft = 57.3 ppm. Breathing zone 0.1 ppm. — A

10:38 PID = 232 ppm at 1.0-1.5 ppm. — A

10:45 at 2 feet there is some coal that seems to be coated in oil. PID of the material is 466 ppm. — A

Signature:

/

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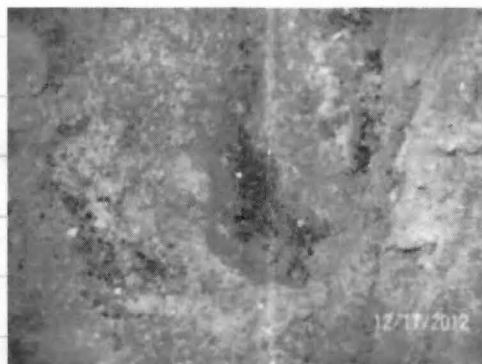
Date:

12/17/12

Logger:

Aaron Noz

10:46 Pictures of coal



10:48 Continue digging _____ An

10:55 We have found some pipes running perpendicular to our trench. _____ An

11:04 The top pipes are 32 inches below grade and are steel or cast iron. — An

11:15 Pipes:



Signature:

An 3 12/17/12

WESTON
SOLUTIONS

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Date:

12/17/12

Logger:

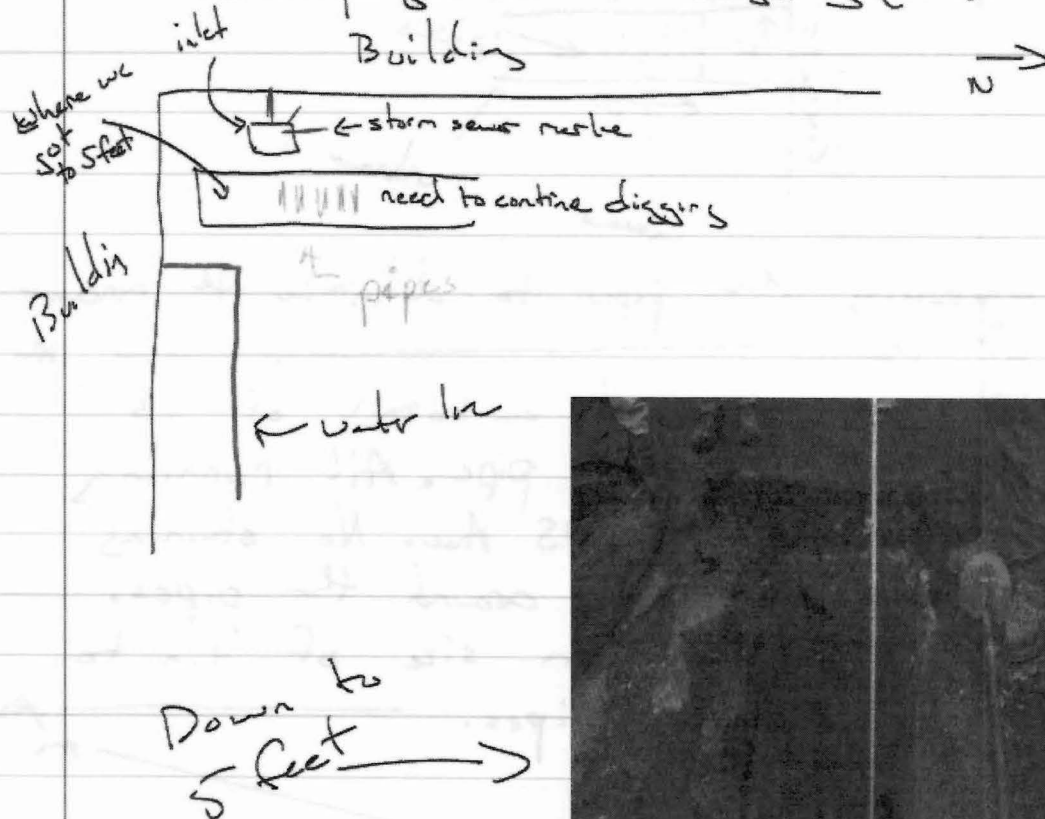
Aaron Mroz

11:30

Dig between 2 Foster Ave and the pipes. We get down just past five feet and there no signs of a culvert going under the building.

11:35

Current progress with digging (NTS)



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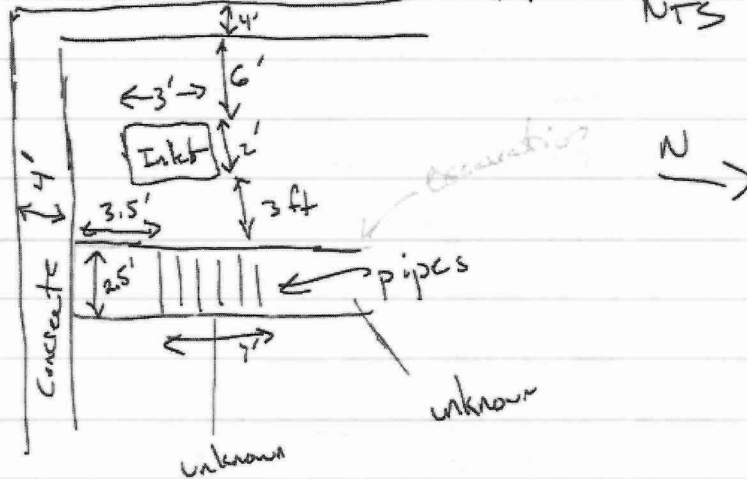
Logger:

Aaron Mroz

12:00

Measurements of Excavation

NTS



12:16

Uncovering the pipes to determine the amount of them.

12:30

We have uncovered a total of 13 cast iron or steel pipe. All running perpendicular to US Ave. No staining or discolored soil around the pipes. The pipes range in size of 4 in to 1.5 in diameter pipes.

Signature:

[Signature]

12/17/12

WESTON
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Logger:

Aaron Mroz

12:35

Pictures of pipes



Runs of pipes

Signature:

A M

12/17/12

WESTON
SOLUTIONS

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Date:

12/17/12

Logger:

Aaron Moz

12:36 Zoom in of pictures of pipes



Am



A

Signature:

[Handwritten signature]

12/17/12

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SOLUTIONS

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Logger:

Aaron Moor

12:50 Continuing the trench toward the north. ————

13:00 PID = 52.7 ppm at 4 feet. ————

13:10 Down to five feet at the northern side of the trench. We have not found anymore pipes. The soil surrounding the pipes is darker/possibly petroleum stained. All the coal material we have found has been above the pipes. The soil in the northern portion of the excavation is lighter. It is the yellowish brown and light grayish native colors.

northern
lighter
color →



← southern
darker
color

13:20 Dug with a shovel below the pipes and the soil is the same ^{color} material as

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Logger:

Aaron Mroz

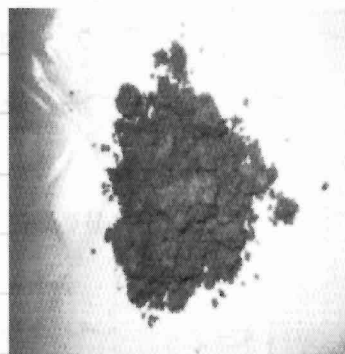
13:25 the northern half of the excavation
XRF soil directly under some of the
pipes at 4.0-4.5 ft

Pb 51 As 7nd

Pb 47 As 7nd

Pb 68 As 7nd

41



13:30 Try and find the unknown compounds into
the excavation from the north east
but there is nothing there. Talk with
Ray about collecting an analytical sample
in the excavation. Ray decides against
it because the excavation has been open
and we can always come back later. 41

13:35 Compacting and backfilling at E2. E3
has been moved 10 feet toward E2 because
E2 is near the parking island and
it will be easier to dig in the new
location. 41

13:40 During backfilling go with EPA & DEP
to investigate the observation point

Signature:

[Handwritten signature]

12/17/12

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Logger:

Aaron Mroz

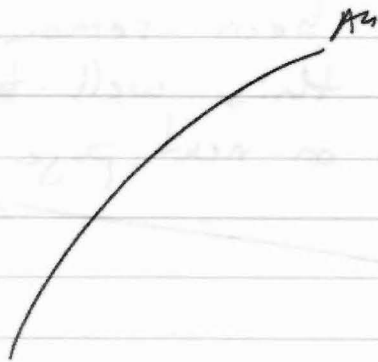
located at 1 Foster Avenue. It is located by the loading docks of 1 Foster Avenue.
 13045 Observation point



Headspace PID = 364 ppm

DTW = 3.04'

DTB = 4.55'



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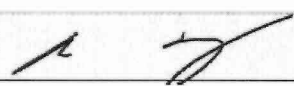
Ann Mroz

14:05 Back to Tank Farm A. ————— A₁14:10 Lynn Vogel offsite. ————— A₁14:35 Final excavation measurements were 2 feet by 24 feet and up to 5 feet deep. Where the pipes were we did not dig down to five feet. ————— A₁

15:10 Mobilize to behind 7 Foster Ave where there is a historic stickup well that was not installed by Shewin-Williams.

15:15 Using bolt cutters & a metal saw to try and cut the lock. ————— A₁

15:30 We have been defeated by the 7 Foster Avenue monitoring well. The jaws of the bolt cutters have been dented and the saw has been dulled and the lock has not been removed. We will return to this well tomorrow to open it. Pictures on next page

Signature:  12/17/12**WESTON**
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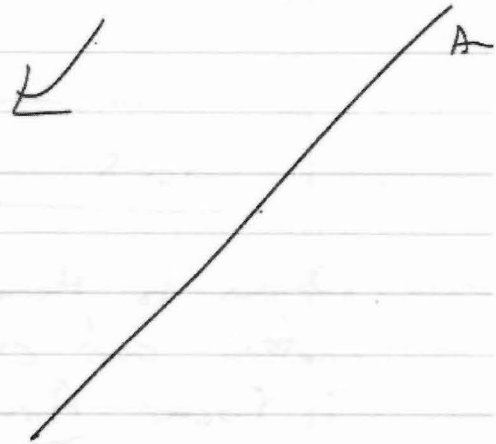
Logger:

Aaron Mroz

15:35 Pictures of the 7 Foster Ave monitoring well



15:45 Back to Tank Farm A. The DGA has been covered and today excavation backfilled and roped off. How we left it



16:00 Weston back to field office, EWTI off site

Signature:

A handwritten signature, likely of Aaron Mroz, followed by the date 12/17/12.

The logo for WESTON SOLUTIONS, featuring the word 'WESTON' in a large, bold, sans-serif font with 'SOLUTIONS' in a smaller font below it.

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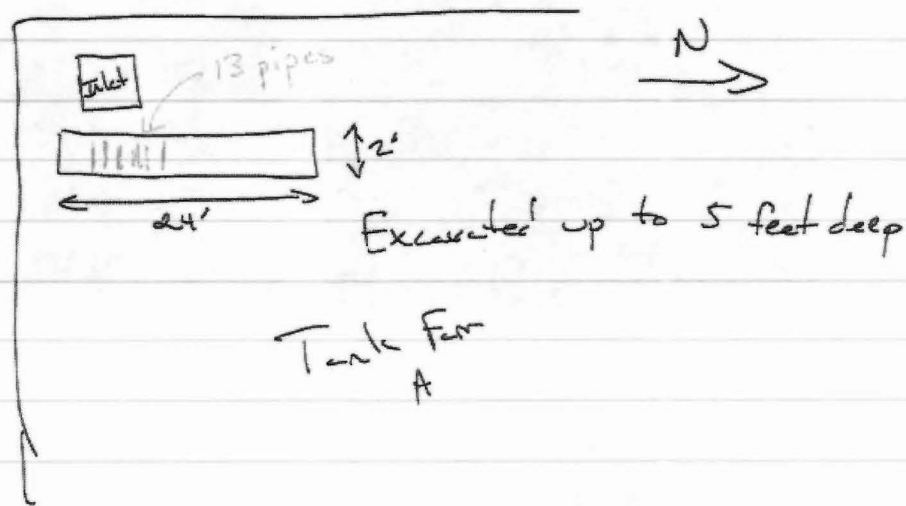
Date:

12/17/12

Logger:

Aaron Mroz

Summary: Completed the Excavation for E2 below is a not to scale diagram



US AVE

16:45 Western to Home Depot to purchase bolt cutters and cheater bars to open the Foster Avenue monitoring well. — A

17:30 Western offsite. — A

Signature:

12/17/12



State of New Jersey
Department of Environmental Protection
601 New York State
P.O. Box 173
Trenton, NJ 08646-0173
Phone: 609-421-1444
Fax: 609-421-1419

JAN 2 - 2001

NJDEP No Further Action Letter for Former Gas Station

Dear Mr. [Name]:

On [Date], the Department received information regarding the potential contamination of the [Address] site. The information was provided by [Source]. The Department conducted an investigation of the site and determined that there is no further action required at this time. The site is not considered a potential source of contamination and no further action is warranted.

The Department's investigation was conducted in accordance with the provisions of the New Jersey Environmental Protection Act (N.J.E.P.A.). The Department's findings are based on the information provided and the results of the investigation. The Department's findings are that the site is not a potential source of contamination and no further action is warranted.

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**State of New Jersey****DEPARTMENT OF ENVIRONMENTAL PROTECTION**

BCAIN - Initial Notice Section

401 East State Street

P.O. Box 435

Trenton, NJ 08625-0435

Phone #: 609-633-1464

Fax #: 609-633-1439

JON S. CORZINE
GovernorLISA P. JACKSON
Commissioner

JUN 2 - 2008

Barry R. Sharer
Gibbsboro Holdings LLC
1103 Laurel Oak Rd, Suite 105B
Voorhees, NJ 08043

Re: **Conditional No Further Action Letter and Covenant Not to Sue (REVISED)**
Unrestricted Use for the Areas of Concern (One 550 gallon leaded gasoline UST & One 1000 gallon leaded gasoline UST)
44 Berlin Road
Block: 21, Lot: 101
44 Berlin Road
Gibbsboro, Camden County
Preferred ID: 422478, Activity Reference Number: USR070001
UST # 422478, TMS #N07-5425

Dear Mr. Sharer:

Pursuant to N.J.S.A. 58:10B-13.1 and N.J.A.C. 7:26C, the New Jersey Department of Environmental Protection (Department) issues this Conditional No Further Action Letter and Covenant Not to Sue for the remediation of the areas of concern specifically referenced above so long as Gibbsboro Holdings LLC did not withhold any information from the Department. This action is based upon information in the Department's case file and Gibbsboro Holdings LLC's final certified report dated August 19, 2007. In issuing this Conditional No Further Action Letter and Covenant Not to Sue, the Department has relied upon the certified representations and information provided to the Department. To remain in compliance with the terms of this Conditional No Further Action Letter and to maintain the benefits of the Covenant Not to Sue, Gibbsboro Holdings LLC as well as each subsequent owner, lessee and operator must comply with the conditions noted below.

By issuance of this Conditional No Further Action Letter, the Department acknowledges the completion of a Site Investigation pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E) for the removal of one 550 gallon leaded gasoline underground storage tank (UST) system, one 1000 gallon leaded gasoline UST system and no other areas. The Department reserves its rights to require any person responsible for the contamination at the site to address Natural Resource Injuries.

CONDITIONS

Pursuant to N.J.S.A. 58:10B-12o, Gibbsboro Holdings LLC and any other person who was liable for the cleanup and removal costs, and remains liable pursuant to the Spill Act, shall inform the Department in writing within 14 calendar days whenever its name or address changes. Any notices submitted pursuant to this paragraph shall reference the above case numbers and shall be sent to: Bureau of Case Assignment and Initial Notice - Case Assignment Section, Enforcement and Assignment Element, P.O. Box 28, Trenton, N.J. 08625.

COVENANT NOT TO SUE

The Department issues this Covenant Not to Sue (Covenant) pursuant to N.J.S.A. 58:10B-13.1. That statute requires a Covenant not to sue with each no further action letter. However, in accordance with N.J.S.A. 58:10B-13.1, nothing in this Covenant shall benefit any person who is liable, pursuant to the Spill Compensation and Control Act (Spill Act), N.J.S.A.

58:10-23.11, for cleanup and removal costs and the Department makes no representation by the issuance of this Covenant, either express or implied, as to the Spill Act liability of any person.

The Department covenants, except as provided in the preceding paragraph, that it will not bring any civil action against

- (a) the person who undertook the remediation;
- (b) subsequent owners of the subject property;
- (c) subsequent lessees of the subject property; and
- (d) subsequent operators at the subject property;

for the purposes of requiring remediation to address contamination which existed prior to the date of the August 19, 2007 final certified Site Investigation report for the real property at the areas of concern identified above, payment of compensation for damages to, or loss of, natural resources, for the restoration of natural resources in connection with the discharge on the property, or payment of cleanup and removal costs for such additional remediation.

Pursuant to N.J.S.A. 58:10B-13.1d, this Covenant does not relieve any person from the obligation to comply in the future with laws and regulations. The Department reserves its right to take all appropriate enforcement for any failure to do so.

The Department may revoke this Covenant at any time after providing notice upon its determination that:

- (a) any person with the legal obligation to comply with any condition in this Conditional No Further Action Letter has failed to do so;

This Covenant, which the Department has executed in duplicate, shall take effect immediately once the person who undertook the remediation has signed and dated the Covenant in the lines supplied below and the Department has received one copy of this document bearing original signatures of the Department and the person who undertook the remediation.

By: _____

Signature: _____

Title: _____

Dated: _____

**NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

By: Kirstin Pointin-Hahn
Bureau of Case Assignment and Initial Notice

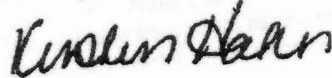
Signature: Kirstin Hahn

Title: Bureau Chief

Dated: 5/23/08

Thank you for your attention to these matters. If you have any questions, please contact Muriel Kiernan at (609) 633-3855

Sincerely,



Kirstin Pointin-Hahn, Bureau Chief
Bureau of Case Assignment and Initial Notice

C Kris Kluk, Kluk Consultants
Municipal Clerk, Gibbsboro
Muriel Kiernan, Case Manager